

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS,
FORT WORTH DIVISION**

CHERYL HURD, M.D.,

Plaintiff,

v.

**TARRANT COUNTY HOSPITAL
DISTRICT d/b/a JPS HEALTH
NETWORK AND JOHN PETER
SMITH HOSPITAL, et al.,**

Defendants.

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CIVIL ACTION NO. 4:22-cv-00388

PLAINTIFF'S EXHIBIT LIST

COMES NOW CHERYL HURD, M.D., Plaintiff in the above cause, and files this her Exhibit List. Plaintiff intends to use exhibits, per the designation that follows:

Ex. No.	Description	Bates No./ECF ID	Admitted
1	Reserved for any Demonstrative or Summary Exhibit Created at Trial with Witnesses		
2	Reserved for any Demonstrative or Summary Exhibit Created at Trial with Witnesses		
3	Reserved for any Demonstrative or Summary Exhibit Created at Trial with Witnesses		
4	Reserved for any Demonstrative or Summary Exhibit Created at Trial with Witnesses		
5	Reserved for any Demonstrative or Summary Exhibit Created at Trial with Witnesses		
6	Employment Agreement – General Psychiatry	ACC 059-75	

Ex. No.	Description	Bates No./ECF ID	Admitted
7	Employment Agreement – MD-Residency Program Director	ACC 001-19	
8	First Amendment to Employment Agreement – MD-Residency Program Director	ACC 020-29	
9	Second Amendment to Employment Agreement Between Acclaim Physician Group, Inc. and Chery Hurd, M.D.	ACC 030-31	
10	Third Amendment to Employment Agreement	ACC 032-34	
11	Fourth Amendment to Employment Agreement	ACC 035-36	
12	Pandemic Plan Agreement	ACC 037-39	
13	Sixth Amendment to Employment Agreement Between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC 040-41	
14	Unexecuted Seventh Amendment to Employment Agreement Between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	HURD 1907	
15	Unexecuted Employment Agreement Cheryl Lynn Hurd, M.D. Specialty: Psychiatry (General)	Parker Email of 11-3-22	
16	DeMoss Contract Terms Emails on May 4, 2022	ACC 695	
17	DeMoss Contract Emails in June 2022	ACC 1055-62	
18	Podawiltz Email of June 2, 2022	ACC 132	

Ex. No.	Description	Bates No./ECF ID	Admitted
19	Executed Seventh Amendment to Employment Agreement Between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	HURD 1931-32	
20	Acclaim Code of Conduct	ACC 042-58	
21	JPS Code of Conduct Procedure	JPS 144-150	
22	JPS HR 1700: Resolution Policy	JPS 013	
23	JPS Peer Review Investigations and Corrective Action	JPS 203-217	
24	JPS Hearings and Appellate Reviews	JPS 217-238	
25	JPS HR 1300, et seq: Drug and Alcohol Policies	JPS 540-557	
26	JPS HR 2700: Protection from Discrimination, Harassment and Retaliation	JPS 562-568	
27	JPS HR 4301: Personal Digital Devices Procedure	JPS 571-573	
28	JPS MS 100: Medical Staff Code of Conduct	JPS 574	
29	JPS HR 2600: Employee Standards	JSP 575	
30	JPS HR 1701: Resolution Procedures	JSP 576-581	
31	JPS HR Memo. 12-10-21 re: Emily Elkins	JPS 342	
32	JPS HR Emails on 12-10-21, 12-13-21 and 12-14-21	JPS 347-348	

Ex. No.	Description	Bates No./ECF ID	Admitted
33	JPS HR Email on 12-20-21	JPS 330	
34	Emily Elkins Email and Statement of 12-20-21	JSP 340-341	
35	JPS HR Memo. 12-20-21 re: Julie Durand	JSP 339	
36	Julie Durand Emails of 12-20-21 and 12-22-21	JPS 335-336	
37	JPS HR Email of 12-23-21	JPS 338	
38	JPS HR Email of 12-29-21	JPS 329	
39	JPS HR Email to Hurd on 12-30-21	JPS 337	
40	JPS HR Emails of 1-6-22 and 1-5-22	JPS 353	
41	JPS HR Email to Hurd of 1-11-22	JPS 345-346	
42	Hurd Statement of 1-12-22	JSP 350	
43	JPS HR and Hurd Emails of 1-13-22	JPS 354-355	
44	JPS HR Emails with Hurd on 1-20-22	JPS 351	
45	JPS HR Emails of 1-20-22	JPS 349	
46	Hurd Resident Evaluation Scores	ACC 300-304	
47	Podawiltz Email to Becker on 3-14-22	ACC 1029	
48	Podawiltz Email to Elliott on 3-14-22	ACC 1077	
49	Podawiltz Email and Talking Points of 3-16-22	ACC 203-204	

Ex. No.	Description	Bates No./ECF ID	Admitted
50	Hurd Email of 3-17-22 and Becker 3-18-22 Response	ACC 583	
51	Becker Email to Podawiltz on 3-18-22	ACC 418	
52	Becker Email to Hurd and Podawiltz on 3-18-22	ACC 173	
53	Hurd and Podawiltz Text of 3-18-22	HURD 1581	
54	Podawiltz Email to Department on 3-18-22	JPS 392	
55	Hurd Text to Elliott of 3-18-22	HURD 1566	
56	Hurd Email of 12-16-21	ACC 1053	
57	Podawiltz Email of 1-14-22	ACC 959	
58	Becker Email of 7-29-22	ACC 682	
59	Podawiltz Email to Becker on 8-10-22	ACC 581	
60	Becker Email to Podawiltz on 8-11--22	ACC 764	
61	Podawiltz Email to Becker on 8-18-22	ACC 304-305	
62	Hurd TCU Offer Letter	HURD 1904-06	
63	Podawiltz Email to Becker on 9-12-22	ACC 312	
64	Dang Email to Elliot on 3-18-22	JPS 400	
65	Elliot Email to Dang on 3-19-22	JPS 414-415	
66	Dang Text with Cheryl Hurd	HURD 1621	

Ex. No.	Description	Bates No./ECF ID	Admitted
67	Alphonso Email to Elliot on 4-28-22	JPS 419-420	
68	Saks Texts with Hurd	HURD 1624-1628	
69	Miles Texts with Hurd	HURD 1730	
70	Keene Texts with Hurd	HURD 1759	
71	Meisamy Texts with Hurd	HURD 1811	
72	Elbaheer Texts with Hurd	HURD 1847	
73	Manjunath Texts with Hurd	HURD 1848	
74	Murad Texts with Hurd	HURD 1892	
75	Whiting Texts with Hurd	HURD 1895	
76	CAP Fellowship and Resident Emails	ACC 211-215, 175, 130, 232-233, 237	
77	Zaner Letter of 3-21-22	JPS 500	
78	Zaner Emails with JPS post-removal	JPS 424-517	
79	Zaner Email of 4-15-22	JPS 518-523	
80	Zaner Email of 5-6-22	JPS 534	
81	Podawiltz Email to Hurd of 6-6-22	ACC 489	
82	DeMoss Emails post-Hurd removal	ACC 89, 90, 267	
83	Curriculum Emails and Discussions	ACC 221-226	

Ex. No.	Description	Bates No./ECF ID	Admitted
84	July 2022 Emails	ACC 90, 492-493, 1074-75	
85	August 2022 Emails	ACC 718-719	
86	Podawiltz Text Messages	JPS 537-539; HURD 1581	
87	DeMoss Text Messages	ACC 1100-1108	
88	Haliburton Text Messages with Hurd	HURD 1658-1709	
89	Haliburton Text Messages	ACC 1109-1112	
90	Haliburton Email of 3-21-22	ACC 370	
91	Hurd Notes	HURD 1-27	
92	Hurd Awards & Degrees	HURD 1556-1562	
93	Hurd Tax Returns	HURD 1415-1488; 1933-1965	
94	Narcissistic Personality Disorder Criteria	HURD 1927-1930	

Plaintiff reserves the right to use the following exhibits or excerpts of them in the form of blow-up, form-board or further summary evidence at trial. No such blow-up, form-board or further summary shall be a new, substantive content.

Plaintiff further reserves the right to utilize and offer evidence and exhibits, as necessary, for purposes of impeachment.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, a true and correct copy of the foregoing pleading was forwarded to all registered counsel via the Court's electronic filing system on the date and time of its submission.

/s/ Christopher S. Ayres
CHRISTOPHER S. AYRES